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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO MOTION FOR LATE ACCEPTANCE OF RESPONSE TO INTERROGATORY USPS/APWU-RT2-2(a) (May 29, 2012)

In accordance with Rule 21 of the Commission's Rules of Practice and Procedure, the American Postal Workers Union, AFL-CIO (APWU) hereby moves for late acceptance of APWU witness Schiller's response to USPS/APWU-RT2-2(a). The response to this interrogatory was due on May 22, 2012; however the production of responsive information required consultation with a third party with a proprietary interest in the responsive information. Unfortunately, this consultation could not be completed in time for a timely response. Counsel for the Postal Service is aware of the reasons for the delay. Thus, while APWU regrets the delay, it believes that no party has been prejudiced by this delay.

Respectfully submitted,

Jennifer L. Wood Counsel for American Postal Workers Union, AFL-CIO